

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHWESTERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**JEFFERY EDWARD HICKS,**

*d/b/a JT Naturals, L.L.C.*

[DOB: 9/27/1958]

Defendant.

No. 18-5011-01-CR-SW-RK

**COUNT 1**

(Mail Fraud)

18 U.S.C. § 1341

NMT 20 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

\$100 Mandatory Special Assessment

**INFORMATION**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this Information:

**Introduction**

1. Between January of 2012, and February of 2017, said dates being approximate, **JEFFERY EDWARD HICKS**, the defendant, was the managing partner, co-owned, and operated a company known as J.T. Naturals, L.L.C., (hereinafter J.T. Naturals), located at 12875 Highway FF, in Joplin, Jasper County, Missouri, within the Western District of Missouri.

2. The defendant owned and operated J.T. Naturals. The purpose of J.T. Naturals was to manufacture active dietary supplement products that the company purported to create from raw ingredients, safety test, and sell to retail distributors throughout the United States and worldwide.

3. The defendant, through J.T. Naturals, routinely received imported raw ingredients from China, Iceland, Sri Lanka, Germany, Japan, Argentina, Canada, and Peru. The raw ingredients were utilized by J.T. Naturals to manufacture and sell finished dietary supplement products.

4. Some of J.T. Naturals customers were located in Boca Raton, Florida, Edgewood, New York, Copperopolis, California, and Oklahoma City, Oklahoma.

5. The finished dietary supplement products manufactured by the defendant, through J.T. Naturals, were shipped from his facility located in Joplin, Missouri, to various customers throughout the United States and worldwide, via the United States Postal Service and private commercial carriers.

6. The defendant, through J.T. Naturals, created documents, including but not limited to “Product Specification Sheets” and a “Certificate of Analysis,” that were issued to its customers, in connection with the sale of its finished dietary supplements. These documents purported to accurately identify the ingredients contained with the finished dietary supplement products, as well as identify all tests conducted by J.T. Naturals to ensure product safety.

#### **The Scheme**

7. The defendant, **JEFFERY EDWARD HICKS**, through his business, J.T. Naturals, would take orders from its customers to provide various finished dietary supplement products.

8. The defendant would cause product labels, created by himself and others, that purported to accurately state the ingredients within the finished dietary supplement product.

9. The defendant, through J.T. Naturals, intentionally and knowingly issued and caused to be issued, “Product Specification Sheets” and “Certificates of Analysis,” to his customers regarding finished dietary supplement products he sold, knowing that the aforementioned documents falsely misstated the ingredients of the products and falsely claimed tests were conducted on the finished dietary supplement products to ensure their safety, when in truth and fact, no such tests were conducted by the defendant or J.T. Naturals prior to their sale or

shipment to customers.

10. The defendant shipped the falsely labeled and untested dietary supplement products from his business in Joplin, Missouri, within the Western District of Missouri, to customers within the United States and throughout the world via the United States Post Office and various private international commercial carriers.

11. Between January 1, 2012, through February 27, 2017, said dates between being approximate, within Jasper County, in the Western District of Missouri, and elsewhere, the defendant, **JEFFERY EDWARD HICKS**, doing business at J.T. Naturals, L.L.C., with the intent to defraud, devised the above-described scheme and artifice to defraud and to obtain money by materially false and fraudulent pretenses, representations, and promises.

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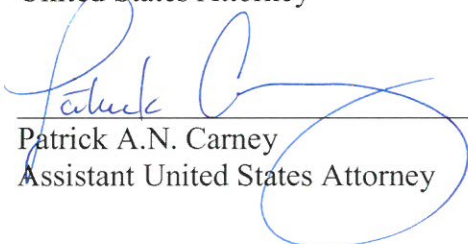
12. The allegations set forth in paragraphs 1 through 11 are hereby incorporated in full.

13. On or about October 27, 2016, said date being approximately, within Jasper County, in the Western District of Missouri, and elsewhere, for the purpose of executing or attempting to execute the above-described scheme and artifice to defraud and deprive, the defendant, **JEFFERY EDWARD HICKS**, doing business as J.T. Naturals, L.L.C., knowingly caused to be delivered by mail according to the direction thereon, the following matter: finished dietary supplement products that purported to contain 1000mg of Wild Alaskan Salmon Oil, and had undergone testing for heavy metals, when in truth and fact, contained materially different

ingredients than what was listed, and the same had not been tested for the presence of heavy metals,  
all in violation of Title 18, United States Code, Section 1341.

Respectfully submitted,

TIMOTHY A. GARRISON  
United States Attorney

  
Patrick A.N. Carney  
Assistant United States Attorney

DATED: 3/2/2018  
Springfield, Missouri